

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ROBIN JOACHIM DARTELL, INDIVIDUALLY  
AND ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

Plaintiffs,  
  
vs.  
  
TIBET PHARMACEUTICALS, INC, et al.  
  
Defendants.

CASE No.: 14-CV-3620-JMV-JBC

**CHALLENGED PLAINTIFFS'  
MOTION TO STRIKE THE  
AFFIDAVIT OF MING ZHU,  
MANAGER OF RMCC  
INVESTMENTS, LLC**

**MOTION DATE: October 16, 2017**

Class Representatives Obasi Investment Limited, Robin Dartell, and Lixin Wu (collectively, the “Challenged Plaintiffs”), respectfully move this Court for an Order striking the Affidavit of Ming Zhu, Manager of RMCC Investments, LLC, (Doc. No. 286-2), which was filed in support of, and relied upon by, Defendants L. McCarthy Downs III’s and Hayden Zou’s Joint Memorandum to Dismiss Certain of the Lead Plaintiffs for Lack of Standing, (Doc. No. 286-1).

In support of this Motion, the Challenged Plaintiffs’ submit a Memorandum of Law dated September 18, 2017.

Dated: September 18, 2017

Respectfully submitted,

/s/ Laurence Rosen  
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Lead Counsel for Plaintiffs and the Class

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of September 2017, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence Rosen